U.S. DISTRICT COURT
N.D. OF N.Y.
FILED

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LAWRENCE K. BAERMAN, CLERK
ALBANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

Reverend Donald W. Elliott Plaintiff(s)	)	Civil Case No.: 1:17-cv-355 (GTS/DJS)
vs.	)	CIVIL RIGHTS COMPLAINT PURSUANT TO 42 U.S.C. § 1983
ACCUB of NYS Defendant(s)	)	

Plaintiff(s) demand(s) a trial by: ◯ JURY ☑ COURT (Select **only** one).

Plaintiff(s) in the above-captioned action, allege(s) as follows:

JURISDICTION

1. This is a civil action seeking relief and/or damages to defend and protect the rights guaranteed by the Constitution of the United States. This action is brought pursuant to 42 U.S.C. § 1983. The Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1343(3) and (4) and 2201.

PARTIES

2. Plaintiff: Reverend Donald W. Elliott

   Address: 13 Ridge Lane
   Box 193
   East Berne NY 12059
   +1-518-669-0629 cell #

   Additional Plaintiffs may be added on a separate sheet of paper.

3. a. Defendant: ACCUB of NYS

   Official Position: Michelle Vennard CEO

   Address: Quackenbush Square
   Albany N.Y.

b. Defendant: ______________________

Official Position: ______________________

Address: ______________________

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c. Defendant: ______________________

Official Position: ______________________

Address: ______________________

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Additional Defendants may be added on a separate sheet of paper.

4. **FACTS**

Set forth the facts of your case which substantiate your claim of violation of your civil and/or Constitutional rights. List the events in the order they happened, naming defendants involved, dates and places.

Note: You must include allegations of wrongful conduct as to EACH and EVERY defendant in your complaint. (You may use additional sheets as necessary).

ACCVB of NYS has been using, selling, publishing giving away my copywritten original artist photos for years. Recently discovered, I had contacted them with a very modest bill to cover two photos but indicated more billing to follow once the number of incedents of publication constituted by a single paper publication, new, ie magazine or print. This requires a contract and property release with identifyers as to volume of publication. Ask me for any example of this.

Example - 1999 Cover of Esquire magazine indicates a story about the crocodile Hunter in Australia. My photos where paid for and release to paper publication of that magazine. 4 photos = 2000.00 fair market value price in 1999. If those photos inside ever make it to the web, the resposible party will be required to pay. Each refresh of a web page constitues a single act of publishing. This was awarded in the court system of NYS in 1999-2000 and file by ASMP in NY. The photographer was awarded 150,000.00 per infringment ie per publication. Its on the books still and was designed to deter and copyright photo theft issues in the future. Here we are gentlemen. Truly believe that the very laws that limit us are the very laws that protect me from financial rape. The State of New York is financial bankrupt as of weeks ago according to the laws on the Books. I personally own the State of New York on paper. My humble payment plan offer must be honored and I will assist in fixing future problems for the said

5. **CAUSES OF ACTION**

Note: You must clearly state each cause of action you assert in this lawsuit.

FIRST CAUSE OF ACTION

Copyright Infringement

SECOND CAUSE OF ACTION

As Above

THIRD CAUSE OF ACTION

As Above

6. **PRAYER FOR RELIEF**

WHEREFORE, plaintiff(s) request(s) that this Court grant the following relief:

I wish to be paid my minimum bill of 50,000,000.00 by April 10th as asked and the rest we can figure of so all parties are satisfied

I declare under penalty of perjury that the foregoing is true ~~and correct~~.

DATED: 3/29/2017 Reverend

Signature of Plaintiff(s)
(all Plaintiffs must sign)